

**EIS000443**

22      **RECEIVED**  
         **OCT 26 1999**

MS. ELDREDGE:    Thank you.    I'm Maureen

ESQUIRE DEPOSITION SERVICES

/

1 Eldredge. I'm program director for the Alliance of Nuclear 2  
1 Accountability. [There is so many flaws in the EIS. I could 3  
be here for several days. I will try to hit the high points 4  
or I suppose the low points. The Yucca Mountain site  
5 unsuitable geological repository fails to address some of the  
2 6 more serious problems.] [In fact, it was clear Yucca Mountain  
7 would fail to meet current standards as set by the EPA.]  
8 [So, Congress required new, less stringent  
9 standards. This is a clear example of defining away a  
3 10 problem rather than seeking a new solution. EIS does not  
11 adequately discuss this and should be more forthright about  
12 the failure of Yucca Mountain as a repository site as rather  
13 than attempting to alter, obscure the facts that support the  
14 alternative.]  
15 [I can only assume even gross incompetence or  
16 clear intent to bias the results for some of the incredible  
1 continued 17 examples of negligence in producing this document, and I  
18 think the drafters should be embarrassed.] [The no action  
4 19 alternatives are ridiculous. They don't pass any muster of  
20 reasonableness. They were clearly chosen to slant the  
21 results. Who could actually expect that we could leave 22  
nuclear waste at reactor sites for 10,000 years or more

4 continued 1 grossly estimated that we could leave it for 100 years and  
2 not do any control and limit decay. That's ridiculous.] [The  
5 3 population estimates for Nye County going out only to 2001 is  
4 unconscionable.

5 Every federal agency does population  
6 statistics that go well beyond the two-year time horizon.]  
7 [It's embarrassing to have a federal document paid for by  
1 continued 8 taxpayer dollars that can't recognize some of these basic 9  
facts.] [The EIS grossly under estimates the transportation  
10 risk from the 50,000 estimated truck shipments of nuclear 11  
6 waste during 24 years of operation.

12 Shipments of this type of waste, at least 90  
13 percent of the volume and this quantity of shipments will be  
14 unprecedented.] [Containers that would be used are unknown and  
15 have not yet been constructed or tested. Therefore, how can  
7 16 DOE make estimates of radiation leakage or how containers  
17 would leak during an accident? They cannot. DOE assumption  
18 that accidents would not occur is entirely unreasonable.]

19 [Additionally, the DOE does not address  
20 emergency response along the route, including training  
8 21 equipment and funding that would be needed. These elements  
22 are crucial to any expectation of an adequate response or

ESQUIRE DEPOSITION SERVICES

1 estimates of risk. Without such equipment and training,  
8 continued 2 fatalities would increase greatly among first responders and  
3 others, and those should be factored in. Finally, the DEIS 4  
does not consider property values. In the consequences of  
9 5 its court cases in New Mexico have shown property along waste  
6 transportation routes decreases in value. This needs to be  
7 examined for Nevada as well.

8 It should recognize that irradiated nuclear  
9 fuel would be much less reactive if it was not shipped until  
10 10 it was 50 years old. It should include as an alternative  
11 waiting 50 years, keeping waste out of reactor sites and then  
12 shipping. It should require as part of the preferred  
13 alternative the shipping container be subject to full scale  
14 testing and revised facilities and injury estimates  
15 accordingly once they have results of that testing.

16 Each estimate should be escorted with  
17 trained and equipped emergency responders to address any  
18 accidents and lessen the risk of sabotage and costs for that  
9 continued 19 should be included. Finally, EIS should obtain estimates of  
20 loss of property values along the likely shipping routes  
11 21 which gets to the points of identifying national routes. How  
22 can people effectively comment? I don't agree with Senator

11  
continued

1 Bryan. DEIS should include the national routes. Everyone  
2 knows pretty much what they are. Let's put them on paper.

12

3 [The ground water from the site currently is  
4 used for agriculture in the regions. DEIS does not fully  
5 address consequences of contamination of the ground water and  
6 its impact on regional uses. It also incorrectly assumes  
7 dilution will reduce the consequence of radiation and that  
8 will be an acceptable way to reduce concentration. Given the  
9 longevity of the container and the mountain barrier has not  
10 been determined, assumptions of contamination are premature  
11 at best and woefully under estimated at worst.

12 The EIS has only covered a span of 10,000  
13 years when DOE's own data indicates that the maximum release  
14 will occur about 300,000 years after the wastes are buried.

13

15 [DOE has moved from a position that the mountain will contain  
16 the waste to the position that the containers and engineered  
17 barriers are the primary waste barrier.]

18 MR. LAWSON: 30 seconds, please.

19 MS. ELDREDGE: [EIS should be reissued to

1 continued

20 speak to Yucca Mountain cannot meet current radioactive release  
21 standards DOE is relying on in a yet to be designed  
22 container. Additional, facilities from the 300,000 year time

1 frame should be estimated. And the standard for repository  
2 must be met at the site, not in the off site location.

3 In conclusion, EIS is fundamentally flawed.  
4 It fails to address key concerns, and it draws the incorrect  
5 conclusion from the available evidence. It should be revised  
6 to include storing waste safely as possible at existing sites  
7 or in close proximity as an alternative in a reasonable  
8 manner to the unrealistic and no action alternative currently  
9 listed.

10 MR. LAWSON: Thank you very much. I would  
11 like to -- it's been brought to my attention that there is  
12 another commissioner here. This one from Michigan who is 13  
scheduled at 12:50, which is just about now, and he has a  
14 plane to make. I'm just wondering if Dennis Nester and Chad  
15 Cowan would mind if Commissioner John Strand moved ahead.